

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
CHARLESTON DIVISION**

WILLIAM E. ROLLINGS AND CHRISTI L. ) CASE NO.: 2:22-cv-02157-DCN  
ROLLINS, AS GUARDIANS AD LITEM )  
FOR THEIR MINOR CHILD, E.R., )  
 )  
Plaintiffs, ) **NOTICE OF REMOVAL**  
 )  
vs. )  
 )  
CADENCE EDUCATION, LLC D/B/A )  
CADENCE ACADEMY, )  
 )  
Defendant. )  
 )

---

Defendant Cadence Education d/b/a Cadence Academy (hereinafter “Defendant”) hereby files this Notice of Removal of this case from the Charleston County Court of Common Pleas, Case No. 2022-CP-10-2131, where it is currently pending, to the United States District Court for the District of South Carolina, Charleston Division, and respectfully shows the Court:

1. On May 6, 2022, Plaintiffs William E. Rollins and Christi L. Rollins, individually and as guardian ad litem for their minor child, E.R. (hereinafter “Plaintiffs”), commenced this pending civil action in the Court of Common Pleas for Charleston County, South Carolina, as Civil Action No. 2022-CP-10-2131. A copy of the Complaint is attached hereto as Exhibit A.
2. Defendant was served with a copy of the Summons and Complaint on June 7, 2022. A copy of the Affidavit of Service is attached hereto as Exhibit B.
3. This Notice of Removal is filed within thirty (30) days of service, in accordance with the provisions of 28 U.S.C. §§ 1441 and 1446.
4. In this action, Plaintiffs seek to recover damages for negligence arising out of an alleged incident at Defendant’s daycare facility.

5. This Court has diversity jurisdiction over this action pursuant to 28 U.S.C. § 1332.

6. Although Defendant denies liability to Plaintiffs, Plaintiffs claim damages in the amount of \$150,000. *See* July 6, 2022 Email, attached hereto as Exhibit C. Therefore, under 28 U.S.C. § 1332, the amount in controversy could exceed \$75,000.

7. Plaintiffs are citizens and residents of Charleston County, South Carolina.

8. Defendant is a limited liability company organized and existing under the laws of Delaware, and all of its members reside outside of South Carolina.

9. Therefore, diversity jurisdiction exists pursuant to 28 U.S.C. § 1332.

10. The United States District Court for the District of South Carolina, Charleston Division, is a federal judicial district embracing the Court of Common Pleas, Charleston County, where this lawsuit was originally filed. Therefore, venue is proper under 28 U.S.C §§ 121(11) and 1441(a).

11. Contemporaneously with the filing of this Notice of Removal, Defendant will give notice to Plaintiff and will also file a copy of this Notice of Removal in the Court of Common Pleas, Charleston County. A copy of the Notice to Plaintiff of Removal of the State Court Action and the Notice to State Court of Filing the Notice of Removal are attached hereto as Exhibit D.

12. By filing this Notice of Removal, Defendant does not waive any defense that may be available to it.

WHEREFORE, Defendant removes the State Court Action to the United States District Court for the District of South Carolina, Charleston Division.

*{Signature page to follow}*

Respectfully submitted,

ETHRIDGE LAW GROUP, LLC

By: s/R. Michael Ethridge

R. MICHAEL ETHRIDGE

Federal Bar No.: 7497

MARY S. WILLIS

Federal Bar No.: 12388

1100 Queensborough Blvd., Suite 200

Mount Pleasant, SC 29464

843-614-0007

[methridge@ethridgelawgroup.com](mailto:methridge@ethridgelawgroup.com)

[mwillis@ethridgelawgroup.com](mailto:mwillis@ethridgelawgroup.com)

*Attorneys for Cadence Education, LLC  
d/b/a Cadence Academy*